

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC., *et al.*,

Defendants.

No. 2:23-cv-0932-JHC

**STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
CERTAIN EXPERT DISCLOSURE
DEADLINES**

NOTE ON MOTION CALENDAR:
February 5, 2025

Pursuant to Fed. R. Civ. P. 6(b)(1), LCR 7(d)(1), and LCR 10(g), the parties, by and through their attorneys of record, respectfully request that the Court enter the Proposed Order set forth below, extending the deadlines for disclosure of certain expert testimony.

In support of this request, the parties represent the following to the Court:

1. Under the Court's scheduling order (Dkt. #199), the deadline for disclosure of expert testimony is February 24, 2025.

2. Counsel for Plaintiff represents that on Friday, January 31, 2025, they were informed that the father of an expert Plaintiff has retained ("Subject Expert") has entered hospice care and is expected to pass in a few weeks.

3. To accommodate Subject Expert so he may provide adequate support to his family during this time, the parties stipulate, subject to Court approval, as follows and jointly request that the Court enter the following Proposed Order approving that stipulation:

- a. Plaintiff's deadline to disclose the expert testimony of Subject Expert shall be extended one-month to March 24, 2025.
- b. Defendants may serve any reports that rebut opinions offered in Subject Expert's report within 30 days after the report's disclosure. Specifically, Defendants' deadline to serve any reports that rebut opinions offered in Subject Expert's report will be April 23, 2025.
- c. All other dates contained in the Court's scheduling order (Dkt. #199) will remain the same.

6. The parties reserve all rights to request further extensions or modifications of deadlines, and to oppose any such requests.

Stipulated to and respectfully submitted this 5th day of February, 2025, by:

FEDERAL TRADE COMMISSION
Attorneys for Plaintiff

By /s/ Sana Chaudhry
Jonathan Cohen (D.C. Bar #483454)
Evan Mendelson (D.C. Bar #996765)
Olivia Jerjian (D.C. Bar #1034299)
Thomas Maxwell Nardini
(IL Bar #6330190)
Sana Chaudhry (NY Bar #5284807)
Anthony Saunders (NJ Bar #008032001)
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington DC 20580
(202) 326-2551; jcohen2@ftc.gov
(202) 326-3320; emendelson@ftc.gov
(202) 326-2749; ojerjian@ftc.gov

(202) 326-2812; tnardini@ftc.gov
(202) 326-2679; schaudhry@ftc.gov
(202) 326-2917; asaunders@ftc.gov

Colin D. A. MacDonald (WSBA # 55243)
Federal Trade Commission
915 Second Ave., Suite 2896
Seattle, WA 98174
(206) 220-4474; cmacdonald@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Approved and Agreed To By:

DAVIS WRIGHT TREMAINE LLP

s/ Kenneth E. Payson
Kenneth E. Payson, WSBA #26369
James Howard, WSBA #37259
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Fax: (206) 757-7700
E-mail: kenpayson@dwt.com
jimhoward@dwt.com

COVINGTON & BURLING LLP

Stephen P. Anthony*
Laura Flahive Wu*
Laura M. Kim*
John D. Graubert*
850 Tenth Street, NW
Washington, DC 20001
Telephone: (202) 662-5105
E-mail: santhony@cov.com
lflahivewu@cov.com
lkim@cov.com
jgraubert@cov.com

John E. Hall*
415 Mission Street, Suite 5400
San Francisco, CA 94105
Telephone: (415) 591-6855
E-mail: jhall@cov.com

Megan L. Rodgers*
3000 El Camino Real
Palo Alto, CA 94306
Telephone: (650) 632-4734
E-mail: mrodgers@cov.com

Anders Linderot*
620 Eighth Avenue
New York, NY 10018
Telephone: (212) 841-1163
Email: alinderot@cov.com

HUESTON HENNIGAN LLP

John C. Hueston*
Moez M. Kaba*
Joseph A. Reiter*
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
E-mail: jhueston@hueston.com
mkaba@hueston.com
jreiter@hueston.com

**admitted pro hac vice*

Attorneys for Defendants
AMAZON.COM, INC., LINDSAY,
GRANDINETTI, AND GHANI

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of February, 2025

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Sana Chaudhry

JONATHAN COHEN (D.C. Bar #483454)
EVAN MENDELSON (D.C. Bar #996765)
OLIVIA JERJIAN (D.C. Bar #1034299)
THOMAS MAXWELL NARDINI (IL Bar #6330190)
SANA CHAUDHRY (NY Bar #5284807)
ANTHONY SAUNDERS (NJ Bar #008032001)
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington DC 20580
(202) 326-2551; jcohen2@ftc.gov (Cohen)
(202) 326-3320; emendelson@ftc.gov (Mendelson)
(202) 326-2749; ojerjian@ftc.gov (Jerjian)
(202) 326-2812; tnardini@ftc.gov (Nardini)
(202) 326-2679; schaudhry@ftc.gov (Chaudhry)
(202) 326-2917; asaunders@ftc.gov (Saunders)

COLIN D. A. MACDONALD (WSBA # 55243)
Federal Trade Commission
915 Second Ave., Suite 2896
Seattle, WA 98174
(206) 220-4474; cmacdonald@ftc.gov (MacDonald)

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

STIPULATION AND [PROPOSED]
ORDER TO EXTEND CERTAIN EXPERT
DISCLOSURE DEADLINES
Case No. 2:23-cv-0932-JHC - 5

Federal Trade Commission
600 Pennsylvania Avenue N.W.
Washington, DC 20580
(202) 326-3320